

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

WEITHORN/CASPER ASSOCIATES FOR  
SELECTED HOLDINGS, LLC,  
STANLEY S. WEITHORN REVOCABLE TRUST,

ARTICLE SIXTH TRUST,

HOWARD B. WEITHORN TRUST,

WEITHORN GRANDCHILDREN CHARITABLE  
LEAD UNITRUST,

WEITHORN FAMILY CHARITABLE LEAD  
ANNUITY TRUST,

LARA L. WEITHORN TRUST,

WEITHORN FAMILY CHARITABLE  
REMAINDER UNITRUST,

Adv. Pro. No. 10-04511 (SMB)

MLM CHARITABLE REMAINDER UNITRUST,

WEITHORN AND EHRMANN FAMILIES  
FOUNDATION,

STANLEY/LOIS CHARITABLE REMAINDER  
UNITRUST,

STANLEY S. WEITHORN, individually, in his  
capacity as General Manager/Partner of  
Weithorn/Casper Associates for Selected Holdings,  
LLC, as trustee of the Article Sixth Trust, Stanley S.  
Weithorn Revocable Trust, Howard B. Weithorn  
Trust, Lara L. Weithorn Trust, Weithorn Family  
Charitable Remainder Unitrust, MLM Charitable  
Remainder Unitrust, Stanley/Lois Charitable  
Remainder Unitrust, and director of Weithorn and  
Ehrmann Families Foundation,

MICHAEL J. WEITHORN, in his capacity as co-  
trustee of the Weithorn Grandchildren Charitable Lead  
Unitrust, and the Weithorn Family Charitable Lead  
Annuity Trust,

WILLIAM J. ROUHANA, JR., in his capacity as co-  
trustee of the Weithorn Grandchildren Charitable Lead  
Unitrust and the Weithorn Family Charitable Lead  
Annuity Trust,

MURIEL CASPER WEITHORN,

COREY CASPER,

HOWARD B. WEITHORN, and

MONROE KLEIN,

Defendants.

**STIPULATION EXTENDING TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,  
that the time by which Weithorn/Casper Associates for Selected Holdings, LLC, Stanley S.  
Weithorn Revocable Trust, Article Sixth Trust, Howard B. Weithorn Trust, Weithorn

Grandchildren Charitable Lead Trust, Weithorn Family Charitable Lead Annuity Trust, Lara L. Weithorn Trust, Weithorn Family Charitable Remainder Trust, MLM Charitable Remainder Unitrust, Weithorn and Ehrmann Families Foundation, Stanley/Lois Charitable Remainder Unitrust, Stanley S. Weithorn, Michael J. Weithorn, William J. Rouhana, Muriel Casper Weithorn, Corey Casper, Howard B. Weithorn, and Monroe Klein (collectively, “Defendants”) may move, answer or otherwise respond to the complaint (the “Complaint”) filed in the above-captioned adversary proceeding (Adv. Pro. No. 10-04511) is extended up to and including January 6, 2016.

The purpose of this stipulated extension (the “Stipulation”) is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Undersigned counsel for the Defendants: (i) expressly represents that as of the date of this stipulation, all of the Defendants represented by the undersigned counsel in the adversary proceeding are alive, or that counsel has previously provided notice to the Trustee in writing of any Defendant’s death; (ii) expressly agrees to notify the Trustee in writing of the death of the Defendant within thirty (30) days of the date of such Defendant’s death, and to provide to the Trustee the county and state of residence at the time of death of the deceased Defendant; and (iii) expressly agrees to reasonably cooperate with the Trustee, where applicable, by, among other things, (a) advising the Trustee whether a probate has or will be filed, (b) filing a stipulation

substituting the deceased Defendant's estate or personal representative/executor and/or (c) advising the Trustee who will represent the deceased Defendant's estate herein and in any probate proceeding. For the avoidance of doubt, the parties to this stipulation expressly agree that the obligations set forth in this paragraph shall continue beyond the time period addressed by the stipulation and shall be ongoing for the duration of the above-captioned adversary proceeding.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 10106) in the above-captioned case (No. 08-01789 (SMB)).

*[Signature Page To Follow]*

Dated: December 1, 2015

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Madoff Investment Securities LLC and the  
estate of Bernard L. Madoff*

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Sixth Trust, Howard B. Weithorn Trust,  
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Trust, Weithorn Family Charitable Lead  
Annuity Trust, Lara L. Weithorn Trust,  
Weithorn Family Charitable Remainder  
Trust, MLM Charitable Remainder Unitrust,  
Weithorn and Ehrmann Families  
Foundation, Stanley/Lois Charitable  
Remainder Unitrust, Stanley S. Weithorn,  
Michael J. Weithorn, William J. Rouhana,  
Muriel Casper Weithorn, Corey Casper,  
Howard B. Weithorn, and Monroe Klein*